COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. No. 99-271

Comments of MCI WorldCom, Inc. Regarding KPMG's Exception No. 6

KPMG Exception No. 6: KPMG is not receiving any Originating Access records.

Domain: BLG

KPMG Assessment: KPMG cannot charge the inter-exchange carrier for originating access for inter-lata calls. In addition, KPMG cannot correctly reconcile its UNE bills.

Date of Exception: February 22, 2000

Date of BA Response: February 29, 2000

Date of MCI WorldCom Comments: March 20, 2000

MCI WorldCom Comments:

Exception Report No. 6 details yet another DUF-related problem for BA. Here, BA admits it is "mistakenly setting a '2' in position 40" for both originating and terminating records. MCI WorldCom, as a facilities based carrier, must be able to bill other IXCs for calls carried for their customers to MCI WorldCom customers. BA's error negatively impacts CLECs by impeding their ability to obtain revenue, and also by causing them to devote additional resources to reconciling BA's erroneous records.

BA claims it will implement "code changes" to fix the problem, but provides no detail as to the root cause of its mistake. Nor does BA explain why the mistake was not detected by its own internal system testing.

BA claims that DUF processed after March 6, 2000 will no longer contain this error. However, even if the current defect is fixed, it is imperative that KPMG fully re-test BA-MA's systems to (a) ensure that BA's code changes actually do fix the problem, and (b) ensure that no other problems are created as a result of BA's code changes.

Finally, one issue not addressed in KPMG's Exception Report, but which nevertheless requires analysis, is the manner in which KPMG, operating as a CLEC, was to alert BA to the existence of these errors. The process for error notification and resolution is critical because with an error similar to

the type described by KPMG (i.e., one that affects BA's records system wide), the volume of erroneous Originating Access records that BA would send to CLECs would be staggering. And without the appropriate BA systems in place to efficiently and quickly resolve its errors, CLECs would bear the undue burden of having to divert valuable resources to resolving the problem, thereby increasing their costs. Indeed, in New York, MCI WorldCom is in the midst of trying to implement an efficient way to return erroneous DUF traffic to BA-NY. MCI WorldCom has received numerous instances of traffic that appears to be from MCI WorldCom customers to lines ***not*** owned by MCI WorldCom. This erroneous traffic causes extra work and increases MCI WorldCom's costs. The problem is exacerbated because there is not currently in place an efficient mechanism for sending the erroneous traffic back to BA-NY. As such, MCI WorldCom has submitted a Change Management Request which proposes that BA-NY implement a mechanized return process. In light of this development, an important aspect of testing in Massachusetts should be whether BA-MA has in place systems that are capable of efficiently handling similar problems on a scale consistent with the presence of mass market CLECs.